

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

---

IN RE: AUTOMOTIVE PARTS	:	Master File No. 12-md-02311
ANTITRUST LITIGATION	:	Honorable Marianne O. Battani

---

IN RE: WIRE HARNESS	:	Case No. 2:12-cv-00103-MOB-MKM
IN RE: INSTRUMENT PANEL CLUSTERS	:	Case No. 2:12-cv-00203-MOB-MKM
IN RE: FUEL SENDERS	:	Case No. 2:12-cv-00303-MOB-MKM
IN RE: HEATER CONTROL PANELS	:	Case No. 2:12-cv-00403-MOB-MKM
IN RE: OCCUPANT SAFETY RESTRAINT SYSTEMS	:	Case No. 2:12-cv-00603-MOB-MKM
IN RE: ALTERNATORS	:	Case No. 2:13-cv-00703-MOB-MKM
IN RE: RADIATORS	:	Case No. 2:13-cv-01003-MOB-MKM
IN RE: STARTERS	:	Case No. 2:13-cv-01103-MOB-MKM
IN RE: SWITCHES	:	Case No. 2:13-cv-01303-MOB-MKM
IN RE: IGNITION COILS	:	Case No. 2:13-cv-01403-MOB-MKM
IN RE: MOTOR GENERATORS	:	Case No. 2:13-cv-01503-MOB-MKM
IN RE: STEERING ANGLE SENSORS	:	Case No. 2:13-cv-01603-MOB-MKM
IN RE: HID BALLASTS	:	Case No. 2:13-cv-01703-MOB-MKM
IN RE: INVERTERS	:	Case No. 2:13-cv-01803-MOB-MKM
IN RE: AIR FLOW METERS	:	Case No. 2:13-cv-02003-MOB-MKM
IN RE: FUEL INJECTION SYSTEMS	:	Case No. 2:13-cv-02203-MOB-MKM
IN RE: AUTOMATIC TRANSMISSION FLUID WARMERS	:	Case No. 2:13-cv-02403-MOB-MKM
IN RE: VALVE TIMING CONTROL DEVICES:	:	Case No. 2:13-cv-02503-MOB-MKM
IN RE: ELECTRONIC THROTTLE BODIES	:	Case No. 2:13-cv-02603-MOB-MKM
	:	

---

THIS DOCUMENT RELATES TO	:	
ALL END - PAYOR ACTIONS	:	

---

**JOINT OBJECTION TO PROPOSED CLASS ACTION  
SETTLEMENTS AND REQUEST FOR ATTORNEYS' FEES**

Class Members Olen York (Claimant No. 9A791897D5), Amy York (Claimant No. F0619D2B2C), and Nancy York (Claimant No. 2D7FB72438) (“Objectors”) join in objecting to the adequacy, fairness and reasonableness of the proposed class action settlements (specifically Autoliv, Inc.) and request for attorneys’ fees based upon the factual and legal grounds set forth below. Objectors qualify to participate in one or more of the class settlements because they purchased the following qualified vehicles from automobile dealerships in the state of West Virginia during the class period that they believe contain eligible automobile parts:<sup>1</sup>

- *2003 Toyota Corolla* (Vin No. JTDBR32E230012891) -- purchased by Olen York in August 2002 from Mike Ferrell Toyota in Chapmanville, WV;
- *2009 Ford Escape XLT 2.5L* (Vin No. 1FMCU03739KA59048) -- purchased by Amy York on May 23, 2009 from River Cities Ford in Lavalette, WV; and
- *2010 Ford Focus SE 2.0L* (Vin No. 1FAHP3FN9AW117065) -- purchased by Olen York, Jr. (deceased) and Nancy York on September 12, 2009 from Stephens Auto in Danville, WV.

Objectors made the following efforts to identify eligible parts in their vehicles: reviewed class notice, settlement website, Autoliv settlement and Second Amended Complaint; called class settlement hotline; wrote to settlement administrator; reviewed manufacturer recalls; requested dealership assistance; ran VIN reports; and conducted internet research. Although Objectors have not pinpointed all eligible parts at time of filing this joint objection, they have good faith grounds to believe they qualify for class membership.<sup>2</sup> For a variety of reasons (set forth below), Objectors’ difficulty in verifying their class membership is cause alone to reject the proposed settlements.

---

<sup>1</sup> Supporting documentation is attached as Exhibit A.

<sup>2</sup> The current data suggest at least one vehicle contains Autoliv’s occupant safety system. Objectors reserve the right to amend or supplement their objections after obtaining additional evidence of their class membership.

## ARGUMENT

### **I. ANY SETTLEMENT THAT MAKES IT VIRTUALLY IMPOSSIBLE TO VERIFY CLASS MEMBERSHIP IS FUNDAMENTALLY UNFAIR BECAUSE THE CLASS DEFINITION IS IMPRACTICAL, THE CLASS NOTICE IS DECEPTIVE, AND INDIVIDUAL ISSUES ARE CERTAIN TO PREDOMINATE—GUARANTEEING A HOPELESSLY UNMANAGEABLE CLASS.**

In what can only be called a farce, the parties to a dozen well-publicized auto parts settlements are waving \$225 million in cash awards at millions of car owners across the country—knowing full well that precious few will ever see a dime because *there is no reasonable or efficient way to establish class membership*.<sup>3</sup> As demonstrated below, the repercussions from this major defect have fatally infected each settlement. Short of judicial intervention, these “consumer” actions will suffer the same fate as so many have before them: *a miniscule claims rate*.<sup>4</sup> Accordingly, this Court’s final approval should be stayed pending publication on the settlement website of a reasonable means for class members to determine which of the covered auto parts are installed in their qualified vehicle.

#### **A. Absent a Reliable and Efficient Method for Linking Covered Parts to Qualified Vehicles, the Class Definition Offers a Form of Clarity Without Any Substance.**

First and foremost is the longstanding principle that “[t]he class definition must be sufficiently definite so that it is *administratively feasible* for the court to determine whether a particular individual is a member of the proposed class.” *Young v. Nationwide Mut. Ins. Co.*, 693 F.3d 532, 537-538 (6th Cir. 2012) (citing 5 James W. Moore et al., *Moore’s Federal Practice* § 23.21[1] (Matthew Bender 3d ed. 1997); see also *John v. Nat’l Sec. Fire & Cas. Co.*, 501 F.3d

<sup>3</sup> Unless otherwise indicated, all bold and italicized words are supplied by Objectors.

<sup>4</sup> Among six class settlements recently analyzed, five delivered miniscule funds to the class: .000006%, .33%, 1.5%, 9.66%, and 12%. “Do Class Actions Benefit Class Members? An Empirical Analysis of Class Actions” (Mayer Brown 2014) at 2.

443, 445 (5th Cir. 2007). A precise definition allows the Court to determine who would be entitled to relief, who would be bound by a judgment, and who is entitled to notice of the action. “For a class to be sufficiently defined, the court must be able to resolve the question of whether class members are included or excluded from the class by reference to objective criteria.” Moore’s Federal Practice § 23.21[3]. This standard assumes, however, that interested individuals can actually **apply** the objective criteria to determine whether they are members of the affected class. See, e.g. *Young v. Nationwide Mut. Ins. Co.*, 693 F.3d at 537 (class membership determined by property location, governmental boundaries, local tax payable & local tax charged); *Kinder v. Nw. Bank*, 278 F.R.D. 176, 183 (W.D.Mich.2011) (class membership shown by using defendant’s ATM at specified location during relevant period for a fee). When an ordinary person cannot make use of the “objective criteria” after exercising reasonable diligence, the parties must provide an efficient mechanism to aid in the process. See, e.g. *Young v. Nationwide Mut. Ins. Co.*, 693 F.3d 532, 540 (6th Cir. 2012) (“Plaintiffs further support administrative feasibility through expert evidence that Defendants’ policy records are in a form compatible with geocoding software”); *Tchoboian v. Parking Concepts*, 2009 U.S. Dist. LEXIS 62122, \*13-14 (C.D. Cal. July 16, 2009) (class members could **self-identify** since they “were either provided a receipt or they were not”).

No such assistance is offered in the present settlements. Instead, the parties tease millions of car owners with a provocative announcement about multi-million dollar settlements without giving them any reasonable way to cash in. According to the long-form notice:

Generally, you are included if, at any time between 1998 and 2015, **depending upon the component part**, you: (1) bought or leased a new motor vehicle in the U.S. (not for resale), or (2) indirectly paid for a motor vehicle replacement part (not for resale). Indirectly means you bought the vehicle replacement part from someone other than the manufacturer of the part.

The list of covered OEM parts reads like a “Who’s Who” in auto mechanics: air flow meters, alternators, ATF warmers, automotive wire harness systems, electronic throttle bodies, fuel injection systems, fuel senders, heater control panels, high intensity discharge ballasts, ignition coils, instrument panel clusters, inverters, motor generators, occupant safety restraint systems, radiators, starters, steering angle sensors, switches and valve timing control devices. To make matters worse, neither the class notice nor the settlement website provides any reasonable means for ordinary consumers to “connect the dots” between covered parts and qualified cars. Instead, the parties simply repeat the obvious:

Generally, you may be included in one or more Settlements if, at any time from 1998 to 2015, you: (1) bought or leased a new motor vehicle in the U.S. (not for resale), or (2) paid to replace one or more of the new motor vehicle parts listed in Question 5 above (not for resale). New motor vehicles include, but are not limited to, automobiles, cars, light trucks, pickup trucks, crossovers, vans, mini-vans, and sport utility vehicles.

For further assistance, readers are encouraged to visit the settlement website, to read any complaint, to review any settlement agreement, or to call the settlement hotline. However, none of these resources provides any meaningful help in connecting the dots between covered parts and qualified vehicles. In fact, there are no records *whatsoever* to determine class membership. One can only conclude that the parties have no internal data to identify class member status. Neither does the Settlement Administrator have any reliable and administratively feasible method for verifying and processing claims.

**B. The Class Members’ Inability to Link Covered Parts with Qualified Vehicles Also Renders the Class Notice Inadequate for Purposes of Satisfying Due Process.**

This fatal defect also has constitutional implications. It is unfair to subject people to a binding judicial proceeding in which their rights or interests are at stake without enabling them to determine their class status. *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306

(1950). “The class definition must be clear in its applicability so that it will be clear later on whose rights are merged into the judgment, that is, who gets the benefit of any relief and who gets the burden of any loss.” *Xavier v. Philip Morris USA Inc.*, 787 F. Supp. 2d 1075, 1089 (N.D. Cal. 2011). An adequate class notice enables potential class members to identify themselves for purposes of opting out of the class. *Carrera v. Bayer Corp.*, 727 F.3d 300, 307 (3d Cir. 2013). It should gain the readers’ attention, show its connection to their lives, and ***prompt them to action***. Managing Class Action Litigation: A Pocket Guide for Judges, at 18-19 (Federal Judicial Center, 2005). The Notice provided to Objectors is not the best notice practicable because the Class is not clearly defined so that the public can read it, determine class membership, and decide whether or not to participate in the settlement. The deficiencies of the Notice harm both absent class members that want to participate in the Settlements, and those that would rather request exclusion and file individual actions.

**C. As a Result of the Parties’ Failure to Link Covered Parts with Qualified Vehicles, Individual Issues On Defendants’ Liability Are Bound to Predominate—Making the Classes Hopelessly Unmanageable.**

Because the proposed Settlements demand individualized procedures to determine class membership, the class will become unmanageable. “If class members are impossible to identify without ***extensive and individualized fact-finding*** or ‘mini-trials,’ then a class action is inappropriate.” *Marcus v. BMW of North America, LLC*, 687 F.3d 583, 593 (3<sup>rd</sup> Cir. 2012). When “the only way to distinguish between the two sets of individuals is to engage in individualized fact-finding,” the class definition is inherently unsatisfactory. *Romberio v. Unumprovident Corp.*, 385 F.Appx. 423, 431 (6th Cir. 2009).

Thus, the Sixth Circuit has expressly rejected class definitions in which “the only way to distinguish between the two sets of individuals [one of which is in the class and the other not] is

to engage in individualized fact-finding.” *Romberio v. Unumprovident Corp.*, 385 F.Appx. 423, 431 (6th Cir. 2009). At best, the absence of a reliable source for linking covered parts to qualified vehicles will force class members to establish their claims through individual hearings; at worst, it will act as a strong deterrent to filing a claim. This same procedural defect will cause incurable manageability issues that invite fraudulent claims. “It is unfair to absent class members if there is a significant likelihood their recovery will be diluted by fraudulent or inaccurate claims.” *Carrera v. Bayer Corp.*, 727 F.3d 300, 310 (3rd Cir. 2013). All things considered, the parties’ failure to provide class members any meaningful way to connect covered parts with qualified vehicles is sufficient cause alone to deny their motions.

## **II. IT IS ALSO UNREASONABLE TO COMMIT UNCLAIMED FUNDS TO UNNAMED CY PRES RECIPIENTS INSTEAD OF INCREASING THE CLASS’ RECOVERY.**

Apart from this fundamental defect in the claims process, the proposed settlements unduly divert unclaimed funds to unnamed *cy pres* recipients instead of enhancing the class awards. Even surplus distributions to ***disclosed*** charities “have been controversial in the courts of appeals.” *Powell v. Ga.-Pac. Corp.*, 119 F.3d 703, 706 (8th Cir. 1997); *Ira Holtzman, C.P.A. v. Turza*, 728 F.3d 682, 689-90 (7th Cir. 2013); *In re Baby Prods. Antitrust Litig.*, 708 F.3d 163, 172-73 (3d Cir. 2013); *In re Lupron*, 677 F.3d at 29-33; *Nachshin*, 663 F.3d at 1038-40; *Klier v. Elf Atochem N. Am., Inc.*, 658 F.3d 468, 473-82 (5th Cir. 2011); *In re Katrina Canal Breaches Litig.*, 628 F.3d 185, 196 (5th Cir. 2010); *Masters v. Wilhelmina Model Agency, Inc.*, 473 F.3d 423, 434-36 (2d Cir. 2007); *Wilson v. Sw. Airlines, Inc.*, 880 F.2d 807, 816 (5th Cir. 1989). In general, the diversion of unclaimed funds to a non-party runs counter to the litigation’s stated purpose. Accordingly, the American Law Institute recommends the following procedure:

- (a) If individual class members can be identified through reasonable effort, and the distributions are sufficiently large to make individual distributions economically



viable, settlement proceeds should be distributed **directly** to individual class members.

(b) If the settlement involves individual distributions to class members and funds remain after distributions (because some class members could not be identified or chose not to participate), the settlement should presumptively provide for further distributions to participating class members **unless** the amounts involved are too small to make individual distributions economically viable or other specific reasons exist that would make such further distributions impossible or unfair.

(c) If the court finds that individual distributions are not viable based upon the criteria set forth in subsections (a) and (b), the settlement may utilize a *cy pres* approach. The court, when feasible, should require the parties to **identify** a recipient whose interests **reasonably approximate** those being pursued by the class. If, and only if, no recipient whose interest reasonably approximate those being pursued by the class can be identified after thorough investigation and analysis, a court may approve a recipient that does not reasonably approximate the interests being pursued by the class.

Principles of the Law of Aggregate Litigation, § 3.07 (2010). When a district court concludes that a *cy pres* distribution is appropriate after applying the foregoing rigorous standards, such a distribution must be “for the next best use . . . for indirect class benefit,” and “for uses consistent with the nature of the underlying action and with the judicial function.” *In re Katrina*, 628 F.3d at 196 (quotations omitted); accord *Klier*, 658 F.3d at 474; *Nachshin*, 663 F.3d at 1040; *Holtzman*, 728 F.3d at 689-90; ALI § 307(c) (“a recipient whose interests reasonably approximate those being pursued by the class”). As stated in *Airline Tickets II*, 307 F.3d at 682: “The unclaimed funds should be distributed for a purpose as near as possible to the legitimate objectives underlying the lawsuit, the interests of class members, and the interests of those similarly situated.”

Despite the obvious need to adopt these precautionary measures, the auto parts Notice is conspicuously silent about the safeguards for earmarking surplus cash. Neither are potential charities named so class members can evaluate their relevance to the suit. Given the real potential for millions of class dollars to remain unclaimed due to a burdensome claims procedure, the lack of attention to this important topic is chilling. The whole subject is summarized in a sentence:



“It’s possible that any money remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries approved by the Court.” On this independent ground, the parties’ motions for final approval should be denied with instructions: (1) to incorporate a clear procedure for implementing the ALI’s safeguards; and (2) to identify several charities whose interests reasonably approximate those of the class.

### **III. THE UNREASONABLENESS OF CLASS COUNSEL’S FEE REQUEST IS DEMONSTRATED BY APPLYING THE SIXTH CIRCUIT’S FACTORS TO THE CIRCUMSTANCES PRESENTED.**

The fallout of the fundamental defect in the claims process even spills over to class counsel’s fee petition. In *Van Horn v. Nationwide Prop. & Cas. Ins. Co.*, 436 F. App’x 496 (6th Cir. 2011), the Sixth Circuit upheld a district court’s decision to reduce class counsel’s requested fees from \$5.9 million to \$3.2 million in a settlement of a class action involving auto-insurance benefits. In affirming the decision, the court pointed out the district court “did not believe that the class members received an especially good benefit [because] Class Counsel chose to pursue a relatively insignificant claim” as opposed to “other potential claims, . . . and *[they] agreed to a settlement mechanism which yielded a low claims rate[.]*” *Id.* at 500. In the interest of securing lucrative fees, class counsel has allowed a defective claims mechanism to infect every settlement. As a result, Objectors believe that class participation in the settlement pool will fall under 1%. Placing self-interest over the class’ interest is a straight line to a lower award. See, e.g. *Greenberg v. Procter & Gamble Co. (In re Dry Max Pampers Litig.)*, 724 F.3d 713, 719 (6th Cir. 2013); *Vasalle v. Midland Funding LLC*, 708 F.3d 747, 755 (6th Cir. 2013). This is sufficient cause alone to deny class counsel’s petition.

Irrespective of class participation, class counsel’s motion falls far short of demonstrating why they deserve 30% of a mega-fund settlement made possible by governmental prosecution.

*See Bowling v. Pfizer, Inc.*, 132 F.3d 1147, 1152 (6th Cir. 1998) (“The district court should pay particularly close attention to counsel’s fee requests, because this money comes from the beneficiaries, not from the defendants.”). The complexity of the issues is a significant factor to be considered in making a fee award. In the present case, class counsel freely admits piggy backing off the government’s intensive efforts to uncover an unlawful price-fixing conspiracy among the defendants. Where a government body has obtained a guilty plea, criminal conviction, or civil judgment against a defendant, class counsel in a “piggyback” class action arising out of the same set of facts face a reduced risk of loss and a reduced risk or burden of discovery and trial. A reasonable attorney fee in such cases may be the value that class counsel adds to the settlement that would have been available to the class but for the counsel’s work. See, e.g., *Swedish Hospital Corp. v. Shalala*, 1 F.3d 1261, 1272 (D.C. Cir. 1993).” *Managing Class Action Litigation: A Pocket Guide for Judges*, at 24 (Federal Judicial Center, 2005).

In the present case, it is uncontroverted that the Department of Justice (“DOJ”) engaged in significant pre-complaint investigation efforts, prosecuted defendants for their antitrust violations, and secured convictions. Indeed, the DOJ began investigating criminal price-fixing and bid-rigging conspiracies years before class counsel even filed suit. In September 2011, the DOJ secured its first criminal convictions against Furukawa Electric Co. Ltd. for its role in a criminal price-fixing and bid-rigging conspiracy involving the sale of parts to automobile manufacturers. As applied to Autoliv, Inc., Plaintiffs’ Second Amended Complaint avers as follows:

5. The U.S. Department of Justice’s (“DOJ”) Antitrust Division is currently conducting a broad criminal investigation into illegal price-fixing and bid-rigging in the automotive parts industry. As part of its criminal investigation, the DOJ is seeking information about unlawful anticompetitive conduct in the market for a number of different but related automotive parts, and the Federal Bureau of Investigation (“FBI”) has participated in raids, pursuant to search warrants, carried out in the offices of a number of major competitors in the automotive parts industry. The automotive parts investigation is the largest criminal investigation the Antitrust

Division has ever pursued, both in terms of its scope and its impact on American consumers and businesses. The ongoing cartel investigation of price-fixing and bid-rigging in the automotive parts industry has yielded more than \$2.4 billion in criminal fines to date.

6. Defendant Autoliv, Inc. has agreed to plead guilty and pay a \$14.5 million fine for its unlawful conduct in conspiring with others to suppress and eliminate competition in the automotive parts industry by agreeing to rig bids for, and to fix, stabilize and maintain the prices of, Occupant Safety Restraint Systems sold to certain automobile manufacturers in the United States and elsewhere at various times from at least as early as March 2006 and continuing until at least February 2011. The combination and conspiracy engaged in by Defendant Autoliv, Inc. and its co-conspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of the Sherman Antitrust Act, 15 U.S.C. §1.

Even Plaintiffs' motion for final approval concedes that "[m]any of the Settling Defendants pleaded guilty to the very conduct alleged by EPPs in their complaints." Motion, at 12. Moreover, they intend to continue riding the DOJ's coattails in order to corral the remaining Defendants. Autoliv's agreement to cooperate is typical:

On or before July 15, 2014, Counsel for Autoliv shall provide Settlement Class Counsel with the identity of all current and former employees of Autoliv who: (1) were interviewed and/or prosecuted by the United States Department of Justice ("DOJ"), the Japanese Fair Trade Commission, the European Commission, or any other government entity (collectively, referred to as "Government Entities") in connection with alleged violations with respect to Occupant Safety Restraint Systems; (2) appeared before the grand jury in the DOJ's investigation into alleged violations with respect to Occupant Safety Restraint Systems; and/or (3) were disclosed to a Government Entity as having knowledge or information relating to investigations into alleged violations with respect to Occupant Safety Restraint Systems.

See, Autoliv Settlement Agreement, para. 30. Because the DOJ's investigations and convictions paved the way for Plaintiffs' success, the risk and complexity of class counsel's enhancement was minimal. *In re First Databank Antitrust Litigation*, 209 F. Supp. 2d 96, 98 (D.D.C. 2002). Consequently, a proper fee award will reflect **class counsel's contribution** to the settlement's value. *Goldberger v. Integrated Resources, Inc.*, 209 F.3d 43, 53-54 (2d Cir. 2000) (4% fee awarded, in part because counsel benefitted from work done by federal authorities); *see*

also *Quantum Health Resources, Inc.*, 962 F. Supp. 1254, 1259 (C.D. Cal. 1997) (court reduced “benchmark” percentage to 10% due to government’s involvement); *In re First Databank Antitrust Litigation*, 209 F. Supp. 2d 96, 98 (D.D.C. 2002) (reducing fee award due to Federal Trade Commission's work reducing risk and complexity to counsel). Because the DOJ's legwork significantly reduced class counsel’s risk in bringing these actions while increasing their chance of success, class counsel’s fee award should be adjusted accordingly.

Class counsel’s desire to reap 30% of the \$225 million settlement pool would be patently unreasonable even without the foregoing mitigating factors. Such a request also violates the longstanding principle that fee awards in mega-fund settlements should be drastically lowered to account for economies of scale. The process begins by selecting the appropriate method for calculating fees under the circumstances presented: lodestar versus percentage-of-the-fund. District courts have discretion “to select the more appropriate method for calculating attorney’s fees in light of the unique characteristics of class actions in general, and of the unique circumstances of the actual cases before them.” *Rawlings v. Prudential-Bache Props., Inc.*, 9 F.3d 513, 516 (6th Cir. 1993). In common fund cases, the award of attorney’s fees need only “be reasonable under the circumstances.” *Id.* However, a district court generally must explain its “reasons for adopting a particular methodology and the factors considered in arriving at the fee.” *Moulton v. U.S. Steel Corp.*, 581 F.3d 344, 352 (6th Cir. 2009) (internal quotation marks omitted).

Upon determining the lodestar, a district court also has discretion to decide whether an upward or downward adjustment is warranted in order to reach a reasonable fee award. *Geier*, 372 F.3d at 792. In considering any adjustment, the Supreme Court has cited with approval twelve factors listed in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974):

(1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the "undesirability" of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar case.

*Hensley v. Eckerhart*, 461 U.S. 424, 430 n.3, 103 S.Ct. 1933, 76 L.Ed.2d 40 (1983).

Although class counsel's fee petition boasts a "negative" lodestar of .9407, Objectors believe that unnecessary duplication of effort and unreasonably high hourly rates (not to mention unjustified pretrial activities) have inflated class counsel's real contribution. See, *Granzeier v. Middleton*, 173 F.3d 568, 577 (6th Cir. 1999).

Plaintiffs' preference for the percentage approach offers little relief. In such case, the court must utilize those factors articulated by the Sixth Circuit for evaluating the fee request. See *Ramey v. Cincinnati Enquirer, Inc.*, 508 F.2d 1188, 1196 (6<sup>th</sup> Cir. 1974). Objectors respectfully submit that the biggest variable affecting the size of the fee is the ***size of the settlement***. "To avoid routine windfalls where the recovered fund runs into the multi-millions, courts typically decrease the percentage of the fee as the size of the fund increases." *Precision Associates, Inc. v. Panalpina World Transp. (Holding) Ltd.*, 08-CV-42 JG VVP, 2013 WL 4525323, at \*16 (E.D.N.Y. Aug. 27, 2013) (internal quotation marks and citation omitted).

One study found that the percentage awarded for federal class action settlements in 2006 and 2007 "tended to drift lower at a fairly slow pace until a settlement size of \$100 million was reached, at which point the fee percentages plunged well below 20 percent, and by the time \$500 million was reached, they plunged well below 15 percent, with most awards at that level under even 10 percent," though that last category covered only eleven settlements. Brian T. Fitzpatrick, *An Empirical Study of Class Action Settlements and Their Fee Awards*, 7 J. Empirical L. Stud.

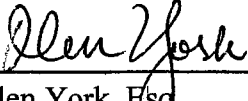
811, 838 (2010). Another study, by Theodore Eisenberg and Geoffrey P. Miller, also showed decreasing percentages as the size of the fund increased. See Theodore Eisenberg and Geoffrey P. Miller, Attorney Fees and Expenses in Class Action Settlements: 1993-2008, 7 J. Empirical L. Stud. 248, 265 (2010). The present case boasts a \$225 million settlement pool. Thus, *it surpasses the threshold for awarding a 20% fee* as a matter of course. When one also considers the unique mitigating factors discussed above, class counsel would be hard pressed to justify a percentage fee award greater than that threshold. Objectors hereby adopt and incorporate all subsequent objections to the proposed settlements and request for attorney's fees filed by other class members.

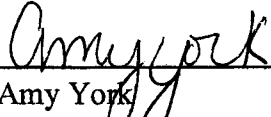
### CONCLUSION

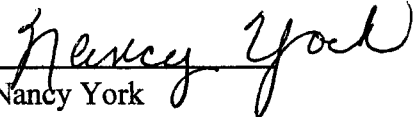
For all of the foregoing reasons, Objectors respectfully request an Order:

1. Denying the parties' joint motion for final approval of the proposed settlements;
2. Reducing class counsel's requested fee award to 20% of the settlement pool;
3. Requiring the parties to provide a reliable and efficient source for linking covered parts with qualified vehicles on the settlement website within 60 days of the Order;
4. Requiring the parties (a) to incorporate a clear procedure for implementing the ALI's safeguards regarding *cy pres* distributions; and (b) to identify several charities whose interests reasonably approximate those of the class; and
5. Requiring the parties to serve an amended Notice of Proposed Class Settlements that incorporates their agreed modifications within 90 days of the Order.

Respectfully Submitted,

  
Olen York, Esq.  
15 Riverview Court  
Milton, W.Va. 25541  
304.633.1178

  
Amy York  
15 Riverview Court  
Milton, W.Va. 25541  
304.633.1178

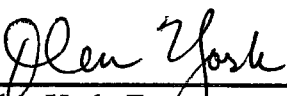
  
Nancy York  
9 Gable Drive  
Milton, WV 25541  
304.743.5949

*Class Members/Joint Objectors*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served by registered mail to the following on April 11, 2016, with instructions to file it electronically via CM/ECF, thereby serving by the same means on all counsel of record:

<b>Court</b>	<b>Notice Administrator</b>
U.S. District Court for the Eastern District of Michigan Clerk's Office Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 564 Detroit, MI 48226	Auto Parts Settlements Objections P.O. Box 10163 Dublin, OH 43017-3163

  
\_\_\_\_\_  
Olen York, Esq.



EXPIRATION DATE				CLASS
MONTH	DAY	YEAR		
06	01	17		A2

The accompanying boat or plate number assigned to the addressee is to be used for the boat/vehicle described on this card.

**RENEWED**  
**6PC327**

**MOTORBOAT/VEHICLE REGISTRATION**  
**STATE OF WEST VIRGINIA**

VEHICLE/BOAT IDENTIFICATION NUMBER		1FMCU03739KA59048
MAKE	YEAR	
FORD	2009	
UT		
LENGTH	WEIGHT	TITLE NUMBER
3355		CN47686
		06/11/09
CABE		

**YORK, AMY C**  
**15 RIVERVIEW CRT**  
**MILTON WV 25541**

SIGN ON THE BACK

EXPIRATION DATE				CLASS
MONTH	DAY	YEAR		
10	01	16		A

**WEST VIRGINIA**  
**REGISTRATION CARD**  
**RENEWAL**

0026721 08

VEHICLE / BOAT / TRAILER IDENTIFICATION NUMBER		1FAHP3FN9AW117065
MAKE / BODY	MODEL / YEAR	
FORD	4D	
10		
WEIGHT	LENGTH	TITLE NUMBER AND DATE
2623		CR58861
		09/29/09
CABE		

**OTT249**

**YORK, NANCY L**  
**9 GABLE DR**  
**MILTON WV 25541-8506**

The owner(s) signature must appear on the back of this registration card.

**dmv**  
West Virginia Department of Transportation

EXHIBIT A-1



Property Damage:	100	\$119.95	100	\$97.67
Uninsured Motorist:	50/100	\$22.92	50/100	\$22.92
Uninsured Motorist Property Damage:	25/300	\$4.47	25/300	\$4.47
Collision:	500	\$242.71	500	\$214.74
Comprehensive:	0	\$133.54	0	\$135.59
Roadside Help:	50	\$5.80	50	\$5.80
New Car Expanded Protection Coverage:				\$16.40

[View](#)

[View](#)

**Vehicle Premium :** **\$741.31** **\$671.87**

#### Special Charges

West Virginia Fire And Casualty Premium Surcharge

**Premiums**

7.77

**Policy Premium :**

**\$1,413.18**

#### Discounts Applied

Discount	2003 TOYOTA COROLLA	2009 FORD TRUCKS ESCAPE
Multi-Car	\$2.55	\$2.55
Anti-Lock Brake	\$63.83	\$55.60
Premier Level 2	\$109.27	\$95.47
Multiple Policy	\$124.95	\$112.72
New Car		\$25.86

#### Surcharges Applied

None

#### People

Name	Type	Relation to Primary	Marital Status	Gender	Date Of Birth	
OLEN YORK	Driver	Same	Married and lives with Spouse	Male	11/17/1972	<a href="#">View</a>
AMY YORK	Driver	Spouse	Married and lives with Spouse	Female	06/15/1974	<a href="#">View</a>

#### Usage

	2003 TOYOTA COROLLA	2009 FORD TRUCKS ESCAPE
Annual Miles:	8,000	8,000
Usage Class:	Work/School	Work/School
Miles One Way:	20	9
Driver Class:	MM11LW	FM11LW
OLEN YORK 11/17/1972 Male Married and lives with Spouse	100 Rated	24
AMY YORK 06/15/1974 Female Married and lives with Spouse	24	100 Rated

#### Policy Details

Application Date: 02/08/2007

Application Time: 17:59

Bind Date: 02/08/2007

Bind Time: 17:59

Version Number: 34

Buyout: Yes

Policy Rate Control: 992

Bind ID:A059198

Agent of Record: Tom Baldwin (41 59198) Channel of Origin: Agency

Channel of Process: Alliance Agency

Channel Of Bind: Alliance Agency

Reset Close Print

### HVBoM - Features for VIN : 1FAHP3FN9AW117065

Model Year:	2010	Vehicle Line:	VL AU
Company Car:	N	Vehicle Body/Cab:	FORD FOCUS 4-DR SEDAN SEL
Ordering Country		Vehicle Type	C - Car
Engine Serial Number:	190709202616	Engine Tag Number:	JG170AA
Vehicle Calibration Number:	AAU1BA0A	Production Date:	10-AUG-2009
Warranty Start Date:	12-SEP-2009	Warranty End Date:	
DSO Number:		EUR Paint Code:	
Selling Dealer Code:	02010	Fleet Code:	
Transmission Serial Number:	080992180290	Interior Trim Code:	FS
Exterior Paint Code:	WS	Tu-Tone Paint Code:	

### Feature Description Table

Feature Code	Feature Description	
<b>AIR BAG RESTRAINT - DRIVER</b>		
CPGAC	ADVANCED AIR BAG RESTRAINT-DRVR	<input type="checkbox"/>
<b>AIR BAG RESTRAINT - PASS</b>		
CPHAD	ADVANCED AIR BAG RESTRNT-PASS	<input type="checkbox"/>
<b>AIR CURTAIN RESTRAINT - LH</b>		
CP1AB	AIR CURTAIN RESTRAINT-LH	<input type="checkbox"/>
<b>AIR CURTAIN RESTRAINT - RH</b>		
CP2AB	AIR CURTAIN RESTRAINT-RH	<input type="checkbox"/>
<b>APPEARANCE PACKAGES</b>		
YPJAL	APPEARANCE PACKAGE	<input type="checkbox"/>
<b>AU -A-C -SURGE</b>		
2XFHB		<input type="checkbox"/>
2XF00	AU -A-C -SURGE	<input type="checkbox"/>
<b>AUDIO - ENTERTAINMENT - IN CAR</b>		
ICED2	GAP SINGLE CD/RAD/MP3 LESS RDS	<input type="checkbox"/>
ICE02	ALL GAP ICE LESS AUDIOPHILE	<input type="checkbox"/>
ICE03	ALL AUDIO UNITS EXC HIGH NAV	<input type="checkbox"/>
<b>AUDIO - RADIO CONTROLS - COLUMN STALK</b>		
IGEAA	LS COLUMN STALK RADIO CONTROLS	<input type="checkbox"/>
<b>AUDIO - RADIO RECEPTION EQUIPMENT</b>		
IBBAB	SATELLITE RADIO RECEPT-AUDIO	<input type="checkbox"/>
<b>AXLE - FINAL DRIVE RATIO - SINGLE SPEED</b>		
EGAFJ	3.34 FINAL DRIVE RATIO	<input type="checkbox"/>
EGA01	ALL SINGLE SPD FINAL DR RATIOS	<input type="checkbox"/>
<b>BODY STYLE</b>		
BS FC	4 DOOR SEDAN-6 LITE	<input type="checkbox"/>
BS 0A	ALL 4 DOOR 6 LITE SEDANS	<input type="checkbox"/>
BS 0B	ALL 4DR/WAGON	

EXHIBIT A-3

BS 0C	ALL SEDANS/HATCHBACKS	<input type="checkbox"/>
BS 0E	ALL 2DR COUPE/4DR SEDAN-6 LITE	<input type="checkbox"/>
BS 03	ALL SEDANS	<input type="checkbox"/>
BS 06	ALL SEDANS/WAGONS/VANS	<input type="checkbox"/>
BS 07	ALL SEDANS/WAGONS	<input type="checkbox"/>
BS 09	ALL 4/5 DOOR SEDANS/WAGON	<input type="checkbox"/>
BS 10	ALL 4 DOOR SEDANS/MAV	<input type="checkbox"/>
<b>BRAKES - ANTI-LOCK</b>		
FEAAB	4 WHL ANTI-LOCK BRAKES	<input type="checkbox"/>
<b>BRAKES - PARKING BRAKE GRIP</b>		
FAFAC	SOFTFEEL HANDBRAKE GRIP	<input type="checkbox"/>
<b>BUMPER - FRONT</b>		
CLFGF	FRT BMP-PLASTIC-BODY COLOR	<input type="checkbox"/>
<b>BUMPER - REAR</b>		
CLMAK	REAR BUMPER-PLASTIC-BODY COLOR	<input type="checkbox"/>
<b>CARGO ORGANIZER - FORD INVOICED ACCESSOR</b>		
FHBAA	LESS CARGO ORGANIZER-FIA	<input type="checkbox"/>
<b>CARGO TRAY - FORD INVOICED ACCESSORIES</b>		
FIQAA	LESS CARGO TRAY-FIA	<input type="checkbox"/>
<b>CLIMATE - AIR CONDITIONING</b>		
AC B	MANUAL AIR CONDITIONER	<input type="checkbox"/>
AC 1	ALL AIR CONDITIONING	<input type="checkbox"/>
<b>CLIMATE - AIR REGISTER</b>		
G1GAB	AIR REGISTER - BASE	<input type="checkbox"/>
<b>DRIVE</b>		
DR A	2 WHL L/H FRONT DRIVE	<input type="checkbox"/>
DR T	ALL 2 WHEEL LEFT HAND DRIVE	<input type="checkbox"/>
DR 1	ALL LEFT HAND DRIVE	<input type="checkbox"/>
DR 2	ALL 2 WHEEL DRIVE	<input type="checkbox"/>
DR 5	ALL FRONT WHEEL DRIVE	<input type="checkbox"/>
<b>DRIVER CONVENIENCE</b>		
YQLAA	LESS DRIVER CONVENIENCE PKG	<input type="checkbox"/>
<b>ENGINE</b>		
EN H4	2.0L 91 RON DURATEC HE	<input type="checkbox"/>
EN 0G	ALL GAS/GASEOUS ENGINES	<input type="checkbox"/>
EN 0S	ALL NON-TURBO ENGINES	<input type="checkbox"/>
EN 04	ALL 4 CYLINDER GAS ENGINES	<input type="checkbox"/>
EN 09	ALL 4 AND 5 CYLINDER ENGINES	<input type="checkbox"/>
EN 1H	ALL NON 3.5L ENGINES	<input type="checkbox"/>
EN 20	ALL 2.0L GAS ENGINES	<input type="checkbox"/>
EN 38	ALL MAZDA I4-NON BZ-ENGINES	<input type="checkbox"/>
EN 52	ALL GAS NON FLEX FUEL ENGINES	<input type="checkbox"/>
EN 8A	ALL ENG EXCLUDING 2.2L DIESEL	<input type="checkbox"/>

EN 8B	ALL ENG EXCL 2.2L DSL 5CYL G	<input type="checkbox"/>
<b>ENGINE - EMISSION REQUIREMENTS</b>		
DGAAB	49 STATE/NON GREEN STATE REQ.	<input type="checkbox"/>
<b>ENGINE - EVAPORATIVE EMISSIONS</b>		
DGBAA	LESS EVAPORATIVE EMISSIONS	<input type="checkbox"/>
<b>ENGINE - HEATER</b>		
DEBAA	LESS IMMERSION HEATER	<input type="checkbox"/>
<b>EXHAUST PIPE EXTENSION</b>		
F5BAA	LESS EXHAUST PIPE EXTENSION	<input type="checkbox"/>
<b>EXHAUST SYSTEMS</b>		
F2AAB	DUAL EXHAUST SYSTEM	<input type="checkbox"/>
<b>EXHAUST TIPS - FORD INVOICED ACCESSORIES</b>		
FIEAA	LESS EXHAUST TIPS-FIA	<input type="checkbox"/>
<b>EXTERIOR - DOOR HANDLE</b>		
CAAAE	EXT DOOR HANDLE-SELF COLOURED	<input type="checkbox"/>
<b>EXTERIOR PAINT - 2003/04/05/06 EXTERIOR</b>		
PN3JD	WHITE SUEDE	<input type="checkbox"/>
<b>FLEET</b>		
YZKAA	RETAIL/STOCK	<input type="checkbox"/>
<b>FRONT - FASCIA</b>		
A3CAB	FRONT FASCIA-LEVEL 1	<input type="checkbox"/>
<b>FRONT FENDER GILL</b>		
A2RAA	LESS FRT FENDER GILL	<input type="checkbox"/>
<b>FUEL - ASSEMBLY PLANT FUEL FILL</b>		
FF1AB	NORMAL FUEL FILL	<input type="checkbox"/>
<b>FUEL ENGINE FUEL CAPABILITY</b>		
GBVAF	UNLEADED FUEL CAPABILITY	<input type="checkbox"/>
GBV01	ALL NON FLEX FUEL CAPABILITY	<input type="checkbox"/>
GBV02	ALL GASOLINE FUEL CAPABILITY	<input type="checkbox"/>
<b>FUEL TANK LOCK</b>		
GBTAB	NON LOCKING FUEL CAP	<input type="checkbox"/>
<b>GRILLE - FRONT</b>		
BLDAB	CHROME GRILLE	<input type="checkbox"/>
<b>GVWS</b>		
AAZWJ	3715 LB. GVW	<input type="checkbox"/>
AAZ01	0 LB THRU 4580 LB GVW	<input type="checkbox"/>
AAZ06	0 LB THRU 8600 LB GVW	<input type="checkbox"/>
<b>HOOD DEFLECTOR - FORD INVOICED ACCESSORI</b>		
FICAA	LESS HOOD DEFLECTOR-FIA	<input type="checkbox"/>
<b>I/P INSERT</b>		
BBQAK	I/P INSERT - BLACK	<input type="checkbox"/>
<b>INSTRUMENTATION - DISPLAYS - COMPASS</b>		
HJFAA	LESS COMPASS DISPLAY	<input type="checkbox"/>
<b>INSTRUMENTATION - MESSAGE CENTER</b>		

HKDAB	MESSAGE CENTER	<input type="checkbox"/>
INSTRUMENTATION - SPEEDOMETERS		
HDHAB	MPH/KPH SPEEDOMETER	<input type="checkbox"/>
INSTRUMENTATION - TYPE		
HCAAJ	HIGH SERIES ANALOG CLUSTER	<input type="checkbox"/>
INTERIOR DOOR HANDLES		
BCFAG	DOOR HANDLES-INSIDE MIC	<input type="checkbox"/>
INTERIOR FLOOR MATS - FORD INVOICED ACCE		
FIDAA	LESS FLOOR MATS-FIA	<input type="checkbox"/>
INTERIOR TRIM COLORS - ALL		
000HB	MEDIUM STONE	<input type="checkbox"/>
LABELS - SPECIAL LANGUAGE		
AEAAE	ENGLISH LANGUAGE LABEL	<input type="checkbox"/>
LAMPS - FOG LAMPS - FORD INVOICED ACCESS		
FHAAA	LESS FOG LAMPS-FIA	<input type="checkbox"/>
LAMPS - FRONT FOG		
JBKAB	FRONT FOG LAMPS	<input type="checkbox"/>
LAMPS - HEADER LIGHTS - INTERIOR MAP		
JCFAC	HEADER MNT COURTESY/2 MAPLIGHT	<input type="checkbox"/>
LAMPS - HEADLAMPS - DESIGN		
JBBAE	HEADLAMPS - LEVEL 1	<input type="checkbox"/>
LAMPS - HEADLAMPS - RUNNING		
JBCAA	LESS DAYTIME RUNNING LAMPS	<input type="checkbox"/>
LAMPS - INTERIOR LIGHT GROUP		
JCBAA	LESS INTERIOR LIGHT GROUP	<input type="checkbox"/>
LAMPS - LOAD COMPARTMENT LIGHT		
JCMAB	LOAD COMPARTMENT LIGHT	<input type="checkbox"/>
LAMPS - TAILLAMPS		
JDAAB	TAILLAMPS-LEVEL 1	<input type="checkbox"/>
LOCKS - DOOR		
CBAAB	POWER DOOR LOCKS	<input type="checkbox"/>
LOCKS - DOOR ENTRY REMOTE CNTR UNIT		
CBFAB	DOOR ENTRY REMOTE CNTR UNIT	<input type="checkbox"/>
LOCKS - TWO STEP DOOR UNLOCK SYSTEM		
CBCAG	CRASH UNLOCKING SYSTEM	<input type="checkbox"/>
LUXURY & CONVENIENCE PACKAGE		
YPDZZ	NO POS SEL FROM THIS FAMILY	<input type="checkbox"/>
MARKET DERIVATIVE		
MD F	FORD DIVISION DERIVATIVE	<input type="checkbox"/>
MD 1	FORD & MERCURY MRKT DERIVATIVE	<input type="checkbox"/>
MARKETING BODY CODE		
YBCPE	MRKTG BODY CODE-P3F	<input type="checkbox"/>
MEDIA GATEWAY MODULE (MGM)		
IEVAA	LESS MEDIA GATEWAY MODULE	<input type="checkbox"/>
MIRROR EC COMPASS - FORD INVOICED ACCES		



FHCAA	LESS EC COMPASS MIRROR-FIA	<input type="checkbox"/>
MIRROR - EXTERIOR DRIVER		
BSDAD	DRIVER POWER MIRROR	<input type="checkbox"/>
BSD0P	ALL POWER EXTR DRIVER MIRRORS	<input type="checkbox"/>
BSD01	ALL MANUAL FOLD MIRRORS-DRV	<input type="checkbox"/>
MIRROR - EXTERIOR FINISH		
BSLAB	EXT MIRROR FINISH-BLACK	<input type="checkbox"/>
MIRROR - EXTERIOR PASSENGER		
BSFAD	PASS POWER CONVEX MIRROR	<input type="checkbox"/>
BSF0P	ALL POWER EXTR PASS MIRRORS	<input type="checkbox"/>
MIRROR - INTERIOR REAR VIEW		
BSBAB	DAY/NIGHT INSIDE MIRROR	<input type="checkbox"/>
MOON AND TUNE PACKAGES		
YQDAA	LESS MOON AND TUNE PACKAGE	<input type="checkbox"/>
OWNER HAND BOOK PACK		
AEDAB	OWNER HAND BOOK PACK	<input type="checkbox"/>
PLANT BUILD REQUIREMENTS		
AAGAZ	WAYNE PLANT BUILD	<input type="checkbox"/>
PROGRAM CONTROL		
AD6HA	2010 JOB #1 PROGRAM CONTROL	<input type="checkbox"/>
REAR END FASCIA		
A1LAB	REAR END FASCIA-LEVEL 1	<input type="checkbox"/>
REMOTE STARTER - FORD INVOICED ACCESSORY		
FIVAA	LESS REMOTE STARTER-FIA	<input type="checkbox"/>
RESTRAINT DEVICE PACKAGES		
CN7AF	BLT W/D&P FRNT/1&2 ROW RSTRNT	<input type="checkbox"/>
ROOF - OPENING PANELS		
CHAAA	LESS ROOF OPENING PANELS	<input type="checkbox"/>
SEAT - DRIVER SEAT AIR BAG RESTR		
CPMAB	DRIVER SEAT AIR BAG RESTRAINT	<input type="checkbox"/>
SEAT - FRONT SEAT TYPE		
FS A	SEAT-SPORT-DRV/PASS	<input type="checkbox"/>
SEAT - PASS SEAT AIR BAG RESTR		
CPNAB	PASS SEAT AIR BAG RESTR	<input type="checkbox"/>
SEAT - TEMP CONTROLLED DRIVER		
BY1AA	LESS TEMP CONTROL DRIVER SEAT	<input type="checkbox"/>
SEAT - TEMP CONTROLLED PASSENGER		
BY2AA	LESS TEMP CONTROL PASSNGR SEAT	<input type="checkbox"/>
SEATS - DRIVER TIP/SLIDE		
BVMAA	LESS DRIVER TIPPING/SLIDE SEAT	<input type="checkbox"/>
SEATS - MRKT CB-TEMP CONTR ST-DRV/PASS		
YCLAA	LESS MK CB-TEMP CONTR ST-DR/PA	<input type="checkbox"/>
SECURITY SYSTEMS		
HNAAD	PERIMETER ANTI-THEFT	<input type="checkbox"/>
SHIFTING AIDS		

IWAAA	LESS SHIFT INDIC LIGHT	<input type="checkbox"/>
<b>SMOKERS PACKAGE</b>		
J3CAA	LESS SMOKERS PACKAGE	<input type="checkbox"/>
<b>SPECIAL BUILD REQUIREMENTS</b>		
SBRAA	LESS SPECIAL BUILD REQUIREMENT	<input type="checkbox"/>
<b>SPEED CONTROL</b>		
GTDAB	SPEED CONTROL	<input type="checkbox"/>
<b>SPOILER - REAR</b>		
BPFAB	SINGLE WING REAR SPOILER	<input type="checkbox"/>
<b>SPRING - COIL LEFT FRONT</b>		
TAAQ6	8S43 5310 C* L/F COIL	<input type="checkbox"/>
<b>SPRING - COIL LEFT REAR</b>		
TAETQ	8S43-5B669-F* L/R COIL (CAR)	<input type="checkbox"/>
<b>SPRING - COIL RIGHT FRONT</b>		
TACQ6	8S43 5310 C* R/F COIL	<input type="checkbox"/>
<b>SPRING - COIL RIGHT REAR</b>		
TAGTQ	8S43-5B669-F* R/R COIL (CAR)	<input type="checkbox"/>
<b>STAR RATING PERF LEVEL</b>		
A5MAB	STAR RATING PERF LEVEL 1	<input type="checkbox"/>
<b>STEERING AIDS</b>		
GPAAB	POWER STEERING-FIXED RATIO	<input type="checkbox"/>
GPA01	ALL POWER STEERING	<input type="checkbox"/>
<b>STEERING WHEEL</b>		
GTAAB	STEERING WHEEL-BASE	<input type="checkbox"/>
<b>SUSPENSION</b>		
DWAAF	STANDARD DUTY SUSPENSION	<input type="checkbox"/>
<b>SUSPENSION - SHOCK ABSORBERS - REAR</b>		
D1GAB	STANDARD DUTY REAR SHOCK ABS	<input type="checkbox"/>
<b>SUSPENSION - STABILIZER BAR - FRONT</b>		
DYKAB	FRONT STABLIZER BAR	<input type="checkbox"/>
<b>SUSPENSION - STABILIZER BAR - REAR</b>		
DZLAA	LESS REAR STABLIZER BAR	<input type="checkbox"/>
<b>TERRITORIES - GENERIC COUNTRY GROUPINGS</b>		
SATAB	GENERIC COUNTRY GROUP 1	<input type="checkbox"/>
<b>TERRITORIES - NORTH AMERICA PRINCIPLE</b>		
WANAB	USA	<input type="checkbox"/>
WAN01	ALL U.S.A. AND CANADA	<input type="checkbox"/>
WAN02	USA,USA TERR,CAN,MEX	<input type="checkbox"/>
WAN03	ALL USA AND MEXICO	<input type="checkbox"/>
<b>TIRE SPARE</b>		
D3MA1	SPARE TIRE-T125/80D15	<input type="checkbox"/>
<b>TIRES - 15 INCH</b>		
D3GBB	P195/60R 15T BSW (87T)	<input type="checkbox"/>
<b>TPO/ORDER CODES 0-300</b>		
YZBBA	TPO/ORDER CODE 200A	<input type="checkbox"/>

<b>TRANSMISSION</b>		
TR D2	4 SPD AUTO VANDYKE FN TRANS	<input type="checkbox"/>
TR 0A	ALL AUTOMATIC TRANSMISSIONS	<input type="checkbox"/>
TR 13	ALL AUTOMATIC TRANSAXLE TRANS	<input type="checkbox"/>
TR 24	ALL 4 SPD AUTO TRANSMISSIONS	<input type="checkbox"/>
<b>TRANSMISSION GEAR SETS</b>		
FJGCK	2.80/1.49/1.00/0.73	<input type="checkbox"/>
<b>TRANSMISSION GEARSHIFT KNOB</b>		
CAEBH	GEARSHIFT KNOB - CHROME ACCENT	<input type="checkbox"/>
<b>VALUE PACKAGES</b>		
YPEAA	LESS VALUE PACKAGE	<input type="checkbox"/>
<b>VEHICLE LINE/LEVEL</b>		
VL AU	FOCUS (CW170) - N.A.	<input type="checkbox"/>
<b>VERSION</b>		
VS CE	SE VERSION - CAR	<input type="checkbox"/>
<b>WHEEL - SPARE</b>		
D17AH	SPARE WHEEL-MINI STEEL	<input type="checkbox"/>
D1702	ALL MINI SPARE WHEELS	<input type="checkbox"/>
<b>WHEEL COVERS</b>		
D5AAA	LESS WHEEL COVERS	<input type="checkbox"/>
<b>WHEEL SIZE/STYLE - 15 INCH</b>		
D2SCV	6X15 MACH ALLOY W/PNTED POCKET	<input type="checkbox"/>
D2S02	6.0 X 15 SUMMARY	<input type="checkbox"/>
<b>WHEELBASE</b>		
A2WAK	103 CAR WHEELBASE	<input type="checkbox"/>
<b>WINDOW/PANEL - RR QRTR VENT</b>		
B2FAA	LESS REAR QUARTER VENT WINDOW	<input type="checkbox"/>
<b>WINDOWS - FRONT SIDE</b>		
B2CAE	PWR FRT WINDOWS ONE TOUCH DOWN	<input type="checkbox"/>
<b>WINDOWS - REAR SIDE</b>		
B2DAC	POWER REAR SIDE WINDOW	<input type="checkbox"/>

Reset Close Print

REQUESTOR : M-DEFLUM

HVBoM

FORD PROPRIETARY, TRANSIENT

ROWS RETURNED : 281  
 TIMESTAMP : 17-Mar-2016 2:53:14 PM  
 RETENTION: NONE

TOP

Reset Close Print

### HVBoM - Features for VIN : 1FMCU03739KA59048

Model Year:	2009	Vehicle Line:	VL M7
Company Car:	N	Vehicle Body/Cab:	FORD ESCAPE 4-DR XLT 4X2
Ordering Country		Vehicle Type	T - Truck
Engine Serial Number:	090908214111	Engine Tag Number:	9G316AA
Vehicle Calibration Number:	9M71A20A	Production Date:	15-OCT-2008
Warranty Start Date:	23-MAY-2009	Warranty End Date:	
DSO Number:		EUR Paint Code:	
Selling Dealer Code:	01991	Fleet Code:	
Transmission Serial Number:	088283076113	Interior Trim Code:	29
Exterior Paint Code:	U1	Tu-Tone Paint Code:	

### Feature Description Table

Feature Code	Feature Description	
	AIR BAG RESTRAINT - DRIVER	
CPGAB	AIR BAG RESTRAINT-DRIVER	<input type="checkbox"/>
	AIR BAG RESTRAINT - PASS	
CPHAB	AIR BAG RESTRAINT-PASS	<input type="checkbox"/>
	AMENITIES PACKAGE	
YQZAA	LESS AMENITIES PACKAGE	<input type="checkbox"/>
	ANTI THEFT SYSTEM - FORD INVOICED ACCESS	
FHXAA	LESS ANTI THEFT SYSTEM - FIA	<input type="checkbox"/>
	AUDIO - RADIO ANTENNA	
ICDAV	SATELLITE ANTENNA (SDARS)	<input type="checkbox"/>
	AUDIO - RADIO CONTROLS - AUTO VOLUME	
IGHAA	LESS RADIO CONTROL AUTO VOLUME	<input type="checkbox"/>
	AUDIO - RADIO FREQUENCY	
IBMAB	NAAO RADIO FREQUENCY	<input type="checkbox"/>
	AUDIO - RADIO RECEPTION EQUIPMENT	
IBBAB	SATELLITE RADIO RECEPT-AUDIO	<input type="checkbox"/>
	AUDIO - RADIO SPEAKERS	
IDBAC	4 RADIO SPEAKERS	<input type="checkbox"/>
	AUDIO - RADIOS	
IBAAZ	ELETR AM/FM STRO/DISC/CLK	<input type="checkbox"/>
IBA00	ALL RADIOS	<input type="checkbox"/>
IBA02	ALL NON CASSETTE RADIOS	<input type="checkbox"/>
IBA03	ALL STEREO RADIOS	<input type="checkbox"/>
IBA05	ALL RADIOS WITH CD PLAYER	<input type="checkbox"/>
IBA06	ALL RADIOS WITHOUT NAVIGATION	<input type="checkbox"/>
	AUDIO PACKAGE	
YPNAA	LESS AUDIO PACKAGE	<input type="checkbox"/>
	AXLE - FINAL DRIVE RATIO - SINGLE SPEED	

EXHIBIT A-4

EGAAG	2.93 FINAL DRIVE RATIO	<input type="checkbox"/>
EGA01	ALL SINGLE SPD FINAL DR RATIOS	<input type="checkbox"/>
<b>BRAKES - ANTI-LOCK</b>		
FEAAB	4 WHL ANTI-LOCK BRAKES	<input type="checkbox"/>
<b>BRAKES - HEV REGENERATIVE BRAKE SYSTEM</b>		
FAKAA	LESS HEV REGEN BRAKE SYSTEM	<input type="checkbox"/>
<b>BUMPER - PROXIMITY SENSOR</b>		
HLHAA	LESS PROXIMITY SENSOR	<input type="checkbox"/>
<b>BUMPER AND FASCIA PACKAGE</b>		
CL9AA	LESS BUMPER/FASCIA PACK	<input type="checkbox"/>
<b>CAB STYLE</b>		
CA WE	5 DOOR LIGHT TRUCK	<input type="checkbox"/>
<b>CARGO AREA COVER</b>		
BDCAB	CARGO AREA COVER	<input type="checkbox"/>
<b>CARGO PACKAGE</b>		
YP4AB	CARGO PACKAGE	<input type="checkbox"/>
<b>CARGO STOW RACK</b>		
BDSAD	CARGO AREA MGMT SYSTEM LEVEL 1	<input type="checkbox"/>
<b>CARGO TRAY - FORD INVOICED ACCESSORIES</b>		
FIQAA	LESS CARGO TRAY-FIA	<input type="checkbox"/>
<b>CENTER PANEL - FINISH</b>		
B57AG	CENTER PANEL-GHIN RIME	<input type="checkbox"/>
<b>CLIMATE - AIR CONDITIONING</b>		
AC B	MANUAL AIR CONDITIONER	<input type="checkbox"/>
AC 1	ALL AIR CONDITIONING	<input type="checkbox"/>
<b>CLIMATE - AIR REGISTER</b>		
G1GAB	AIR REGISTER - BASE	<input type="checkbox"/>
<b>COLD WEATHER GROUP</b>		
ABCAA	LESS COLD WEATHER GROUP	<input type="checkbox"/>
<b>COMFORT PACK</b>		
J5XAA	LESS COMFORT PACK	<input type="checkbox"/>
<b>CONSOLE - OVERHEAD</b>		
B5VAL	OVERHEAD CONSOLE-2 SUNGLS BINS	<input type="checkbox"/>
<b>CONSOLE - UNIQUE CONSOLE TOP PLATE</b>		
B5SAE	CONSOLE TOP PLATE-METALLIC	<input type="checkbox"/>
<b>CONVENIENCE GROUP</b>		
AAMAB	CONVENIENCE GROUP	<input type="checkbox"/>
<b>DOOR SWITCHPACK FINISHER</b>		
BAZAZ	DR SP FNSH-FR-GHIN RIME/RR-MIC	<input type="checkbox"/>
BAZ02	ANY MIC DR SWTCHPACK FINISHERS	<input type="checkbox"/>
<b>DRIVE</b>		
DR A	2 WHL L/H FRONT DRIVE	<input type="checkbox"/>
DR T	ALL 2 WHEEL LEFT HAND DRIVE	<input type="checkbox"/>
DR 1	ALL LEFT HAND DRIVE	<input type="checkbox"/>
DR 2	ALL 2 WHEEL DRIVE	<input type="checkbox"/>

DR 5	ALL FRONT WHEEL DRIVE	<input type="checkbox"/>
DVD PACK - FORD INVOICED ACCESSORIES		
FI2AA	LESS DVD PACK-FIA	<input type="checkbox"/>
ELECTRICAL OUTLET		
J3AAA	LESS ELECTRICAL OUTLET	<input type="checkbox"/>
ENGINE		
EN S7	2.5L DOHC PFI 4 CYL GAS	<input type="checkbox"/>
EN 0G	ALL GAS/GASEOUS ENGINES	<input type="checkbox"/>
EN 04	ALL 4 CYLINDER GAS ENGINES	<input type="checkbox"/>
EN 09	ALL 4 AND 5 CYLINDER ENGINES	<input type="checkbox"/>
ENGINE - EMISSION REQUIREMENTS		
DGABG	TIER 2 BIN 5 - MFC	<input type="checkbox"/>
ENGINE - HEATER		
DEBAA	LESS IMMERSION HEATER	<input type="checkbox"/>
ENGINE - STARTER/CLUTCH INTERLOCK		
DEHAA	LS START/CLUTCH PEDAL INTERLOC	<input type="checkbox"/>
EXCLUSIVE PACK		
AB4AA	LESS EXCLUSIVE PACK	<input type="checkbox"/>
EXTERIOR - DOOR HANDLE		
CAAAB	EXTERIOR DOOR HANDLE-BLACK	<input type="checkbox"/>
EXTERIOR APPEARANCE GROUP		
AB2AA	LESS APPEARANCE GROUP	<input type="checkbox"/>
EXTERIOR PAINT - 2003/04/05/06 EXTERIOR		
PN3KT	SPORT BLUE METALLIC	<input type="checkbox"/>
FEATURE CONTENT GROUP		
AD2AB	FEATURE CONTENT GROUP 1	<input type="checkbox"/>
FLEET		
YZKAA	RETAIL/STOCK	<input type="checkbox"/>
FLOOR MATS - INTERIOR FRONT		
BBHAB	FRONT THROW IN CARPET FLR MATS	<input type="checkbox"/>
FLOOR MATS - INTERIOR REAR		
BBIAB	REAR THROW IN CARPET FLR MATS	<input type="checkbox"/>
FLOOR MATS LEVEL 2 - FORD INVOICED ACCES		
FHEAA	LESS FLOOR MATS LEVEL 2-FIA	<input type="checkbox"/>
FTO PACKAGE		
YQ6AA	LESS FTO PACKAGE	<input type="checkbox"/>
FUEL - ASSEMBLY PLANT FUEL FILL		
FF1AB	NORMAL FUEL FILL	<input type="checkbox"/>
FUEL ENGINE FUEL CAPABILITY		
GBVAF	UNLEADED FUEL CAPABILITY	<input type="checkbox"/>
GBV01	ALL NON FLEX FUEL CAPABILITY	<input type="checkbox"/>
GBV02	ALL GASOLINE FUEL CAPABILITY	<input type="checkbox"/>
FUEL KIT - FORD INVOICED ACCESSORIES		
FHHAA	LESS FUEL KIT	<input type="checkbox"/>
FUEL LABEL		

B1BAB	BP FUEL LABEL	<input type="checkbox"/>
FUEL TANK LOCK		
GBTAG	NON LOCKING CAPLESS FUEL FILL	<input type="checkbox"/>
FUEL TANKS		
GBAAB	SINGLE FUEL TANK	<input type="checkbox"/>
GEARCHANGE LEVER SURROUND		
HCKAE	CHROME SURROUND	<input type="checkbox"/>
GRILLE - FRONT		
BLDC7	GRILLE-BRIGHT UPPER/BC LOWER	<input type="checkbox"/>
GVWS		
AAZBU	4440 LB. GVW	<input type="checkbox"/>
AAZ01	0 LB THRU 4580 LB GVW	<input type="checkbox"/>
AAZ06	0 LB THRU 8600 LB GVW	<input type="checkbox"/>
HORNS - ELECTRICAL		
HIAAA	LESS ELECTRIC HORN	<input type="checkbox"/>
INFORMATION PACKAGE		
YQXAA	LESS INFO/TECH PACKAGE	<input type="checkbox"/>
INSTRUMENTATION - DISPLAYS - COMPASS		
HJFAB	COMPASS DISPLAY	<input type="checkbox"/>
INSTRUMENTATION - MESSAGE CENTER		
HKDAB	MESSAGE CENTER	<input type="checkbox"/>
INSTRUMENTATION - NAVIGATION CENTER		
HKCAA	LESS NAVIGATION CENTER	<input type="checkbox"/>
INSTRUMENTATION - SPEEDOMETERS		
HDHAB	MPH/KPH SPEEDOMETER	<input type="checkbox"/>
INSTRUMENTATION - TIRE INFLATION MONITOR		
HJCAB	TIRE INFLATION MONITOR	<input type="checkbox"/>
INTERIOR DOOR HANDLES		
BCFAG	DOOR HANDLES-INSIDE MIC	<input type="checkbox"/>
INTERIOR DOOR TRIM PANEL INSERT		
BCLET	DOOR TRIM PNL INSERT-ECO	<input type="checkbox"/>
INTERIOR FLOOR MATS - FORD INVOICED ACCE		
FIDAA	LESS FLOOR MATS-FIA	<input type="checkbox"/>
INTERIOR TRIM COLORS - ALL		
000Y9	CHARCOAL	<input type="checkbox"/>
INTERIOR TRIM PACKS		
ABBAA	LESS TRIM PACK	<input type="checkbox"/>
LABELS - SPECIAL LANGUAGE		
AEAAE	ENGLISH LANGUAGE LABEL	<input type="checkbox"/>
LAMPS - FRONT FOG		
JBKAB	FRONT FOG LAMPS	<input type="checkbox"/>
LAMPS - HEADER LIGHTS - ROOF		
JCGAB	DOME MAPLIGHT	<input type="checkbox"/>
LAMPS - HEADLAMP CONTROL		
JEDAC	AUTOMATIC HEADLAMP CONTROL OFF	<input type="checkbox"/>



<b>LAMPS - HEADLAMPS - RUNNING</b>		
JBCAA	LESS DAYTIME RUNNING LAMPS	<input type="checkbox"/>
<b>LAMPS - INTERIOR LIGHT GROUP</b>		
JCBAA	LESS INTERIOR LIGHT GROUP	<input type="checkbox"/>
<b>LAMPS - SIDE FLASHERS</b>		
JBGAA	LESS SIDE REPEAT FLASHERS	<input type="checkbox"/>
<b>LICENSE PLATE BRACKET - FRONT</b>		
CLVAB	FRT LICENSE PLATE BRKT/HOLDER	<input type="checkbox"/>
<b>LOCK - KEY/BRAKE/GEAR SHIFT LOCK</b>		
FLSAC	KEY/BRK/GEAR SHFI/LOC-ELEC MEC	<input type="checkbox"/>
<b>LOCK - LIFTGATE/TAILOUT HANDLE - EXTERI</b>		
CACAH	LIFT/DECKLID HNDL EXT- A-GLOSS	<input type="checkbox"/>
<b>LOCKS - DOOR ENTRY REMOTE CNTR UNIT</b>		
CBFAE	ILLUMINATED DOOR ENTRY KEYPAD	<input type="checkbox"/>
<b>LUXURY PACK</b>		
J5LAA	LESS LUXURY PACK	<input type="checkbox"/>
<b>MARKETING BODY CODE</b>		
YBCEQ	MRKTG BODY CODE-U03	<input type="checkbox"/>
<b>MEDIA GATEWAY MODULE (MGM)</b>		
IEVAA	LESS MEDIA GATEWAY MODULE	<input type="checkbox"/>
<b>MIRROR - EXTERIOR DRIVER</b>		
BSDB8	DRV MANUAL FOLD, POWER ADJUST	<input type="checkbox"/>
<b>MIRROR - EXTERIOR FINISH</b>		
BSLAE	EXT MIRRORS MOULDED-IN COLOR	<input type="checkbox"/>
<b>MIRROR - EXTERIOR PASSENGER</b>		
BSFB8	PASS MANUAL FOLD, POWER ADJUST	<input type="checkbox"/>
<b>MIRROR - INTERIOR REAR VIEW</b>		
BSBAF	ELECTROCHROMIC INSIDE MIRROR	<input type="checkbox"/>
<b>MOON AND TUNE PACKAGES</b>		
YQDAA	LESS MOON AND TUNE PACKAGE	<input type="checkbox"/>
<b>MOULDINGS - EXTERIOR ROCKER PANEL</b>		
BMDAH	ROCKER PANEL MLD-BODY COLOR	<input type="checkbox"/>
<b>M7 -B-C -HIGH-FORD</b>		
5T2Y9		<input type="checkbox"/>
5T200	M7 -B-C -HIGH-FORD	<input type="checkbox"/>
<b>OWNER HAND BOOK PACK</b>		
AEDAB	OWNER HAND BOOK PACK	<input type="checkbox"/>
<b>PLANT BUILD REQUIREMENTS</b>		
AAGAJ	KANSAS CITY PLANT BUILD	<input type="checkbox"/>
<b>PREMIUM GROUP</b>		
ADRAA	LESS PREMIUM GROUP	<input type="checkbox"/>
<b>PROGRAM CONTROL</b>		
AD6GA	2009 JOB #1 PROGRAM CONTROL	<input type="checkbox"/>
<b>REMOTE STARTER - FORD INVOICED ACCESSORY</b>		
FIVAA	LESS REMOTE STARTER-FIA	<input type="checkbox"/>

<b>ROOF - OPENING PANELS</b>		
CHAAA	LESS ROOF OPENING PANELS	<input type="checkbox"/>
<b>ROOF RACK</b>		
BLYAB	ROOF RACK INCLUDING CROSSBARS	<input type="checkbox"/>
BLY01	ALL ROOF RACKS	<input type="checkbox"/>
<b>SALES BADGE</b>		
AB5AA	LESS SALES BADGE	<input type="checkbox"/>
<b>SALES FEATURE CODE-LEVEL 1</b>		
AC1AA	LESS SALES FEATURE - LEVEL 1	<input type="checkbox"/>
<b>SEAT - DRIVER SEAT BACK MTD MAP POCKET</b>		
BU6AB	DRV SEAT BACK MTD MAP POCKET	<input type="checkbox"/>
<b>SEAT - FRONT SEAT TYPE</b>		
FS B	SEAT-INDIVIDUAL-L/B DRV/PASS	<input type="checkbox"/>
<b>SEAT - PASS SEAT BACK MTD MAP POCKET</b>		
BU7AB	PASS SEAT BACK MTD MAP POCKET	<input type="checkbox"/>
<b>SEAT - TEMP CONTROLLED DRIVER</b>		
BY1AA	LESS TEMP CONTROL DRIVER SEAT	<input type="checkbox"/>
<b>SEAT - TEMP CONTROLLED PASSENGER</b>		
BY2AA	LESS TEMP CONTROL PASSNGR SEAT	<input type="checkbox"/>
<b>SEAT ADJUSTER - DRIVER</b>		
BYPAC	POWER 6-WAY DRIVER SEAT ADJUST	<input type="checkbox"/>
<b>SEATS - LUMBAR SEAT SUPT - L/H SIDE</b>		
BVUAA	LESS L/H SIDE LUMBAR SEAT SUPT	<input type="checkbox"/>
<b>SEATS - SECOND ROW SEATING</b>		
BYBA1	2ND ROW - SPLIT BENCH 2 PASS	<input type="checkbox"/>
<b>SERIES</b>		
SE EF	FORD SERIES	<input type="checkbox"/>
<b>SMOKERS PACKAGE</b>		
J3CAA	LESS SMOKERS PACKAGE	<input type="checkbox"/>
<b>SPECIAL EQUIPMENT PACKAGES</b>		
AALAA	LESS SPECIAL EQUIPMENT PACKAGE	<input type="checkbox"/>
<b>SPECIAL VALUE PACK</b>		
ABEAA	LESS SPECIAL VALUE PACKAGES	<input type="checkbox"/>
<b>SPEED CONTROL</b>		
GTDAB	SPEED CONTROL	<input type="checkbox"/>
<b>SPRING - COIL LEFT FRONT</b>		
TAAQ8	9L84 5310 B L/F COIL	<input type="checkbox"/>
<b>SPRING - COIL RIGHT FRONT</b>		
TACQY	9L84 5310 B R/F COIL	<input type="checkbox"/>
<b>SPRING - LEAF LEFT REAR</b>		
TAJD8	9L84 5726 A L/R LEAF	<input type="checkbox"/>
<b>SPRING - LEAF RIGHT REAR</b>		
TAKD8	9L84 5726 A R/R LEAF	<input type="checkbox"/>
<b>STAR RATING PERF LEVEL</b>		
A5MAB	STAR RATING PERF LEVEL 1	<input type="checkbox"/>

<b>STEERING DAMPER</b>		
GMBA	LESS STEERING DAMPER	<input type="checkbox"/>
<b>STEERING WHEEL</b>		
GTAAE	STEERING WHEEL-LEATHER WRAPPED	<input type="checkbox"/>
<b>STEERING WHEEL - REDUNDANT CONTROLS</b>		
GTEAA	LESS REDUNDANT CTL -STEER WHL	<input type="checkbox"/>
<b>SUSPENSION</b>		
DWAAF	STANDARD DUTY SUSPENSION	<input type="checkbox"/>
<b>TERRITORIES - GENERIC COUNTRY GROUPINGS</b>		
SATAB	GENERIC COUNTRY GROUP 1	<input type="checkbox"/>
<b>TERRITORIES - NORTH AMERICA PRINCIPLE</b>		
WANAB	USA	<input type="checkbox"/>
WAN01	ALL U.S.A. AND CANADA	<input type="checkbox"/>
WAN02	USA,USA TERR,CAN,MEX	<input type="checkbox"/>
WAN03	ALL USA AND MEXICO	<input type="checkbox"/>
<b>THERMOMETER-OUTSIDE TEMP</b>		
HJEAB	OUTSIDE TEMP THERMOMETER	<input type="checkbox"/>
<b>TIRE SPARE</b>		
D3MAQ	SPARE TIRE - T145/90R17	<input type="checkbox"/>
<b>TIRES - 16 INCH</b>		
D3JU6	P235/70R-16T BSW A-S	<input type="checkbox"/>
<b>TPO/ORDER CODES 301-599</b>		
YZCAB	TPO/ORDER CODE 305A	<input type="checkbox"/>
<b>TRAILER TOWING</b>		
C1CAA	LESS TRAILER TOWING PACKAGE	<input type="checkbox"/>
<b>TRANSMISSION</b>		
TR W6	6 SPD AUTO TRANS 6F MID-RANGE	<input type="checkbox"/>
TR 0A	ALL AUTOMATIC TRANSMISSIONS	<input type="checkbox"/>
TR 06	ALL 6 SPD AUTO TRANSMISSIONS	<input type="checkbox"/>
<b>TRANSMISSION GEARSHIFT KNOB</b>		
CAEBW	GEARSHIFT KNOB - MIC INSERT	<input type="checkbox"/>
<b>UNDERBODY PROTECTION</b>		
A1CAA	LESS UNDERBODY PROTECTION	<input type="checkbox"/>
<b>VERSION</b>		
AAAAD	XLT VERSION	<input type="checkbox"/>
<b>VERSION - EXTERIOR - APPEARANCE PACK</b>		
ABFAA	LESS EXT APPEARANCE PACK	<input type="checkbox"/>
<b>VERSION - LIVERY PACKAGE</b>		
YQAZZ	NO POS SEL FROM THIS FAMILY	<input type="checkbox"/>
<b>VERSION PACKAGES</b>		
AACAA	LESS VERSION PACKAGES	<input type="checkbox"/>
<b>VISOR - SUNVISORS - DRIVER</b>		
BCAAE	SUNVISOR,SINGLE-DRV ILLUM	<input type="checkbox"/>
<b>VISOR - SUNVISORS - PASSENGER</b>		
BCBAE	SUNVISOR,SINGLE-PASS ILLUM	<input type="checkbox"/>